



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY**

**REGION IX**

**75 Hawthorne Street  
San Francisco, CA 94105-3901**

February 11, 2008

Matthew DeBurle  
Supervisor, Permitting Branch  
Nevada Bureau of Air Pollution Control  
901 S. Stewart St., Suite 4001  
Carson City, Nevada 89701

Dear Mr. DeBurle:

Thank you for the opportunity to review the Bureau of Air Pollution Control's (BAPC) proposed Operating Permit to Construct modification for the Nevada Cement plant in Lyon County.

Nevada Cement has proposed to decommission two existing kilns and construct a new precalciner kiln (and the associated addition of new equipment and modification of existing equipment). According to BAPC, the project is not a major modification under the Prevention of Significant Deterioration (PSD) regulations because it will not cause a significant emissions increase of any "NSR regulated pollutant," as that term is defined under the PSD regulations at 40 CFR 52.21. According to BAPC's Application Technical Review document, the facility's NO<sub>x</sub> emissions will decrease by 888 tons per year (using the baseline actual to potential emissions calculation method). For the new kiln, BAPC has proposed a NO<sub>x</sub> emission limit of 540 lb/hr and a clinker production rate of 1,182,600 tons per year, which is the equivalent of 4.0 lb. NO<sub>x</sub> per ton of clinker produced.

We have not performed a detailed review BAPC's facility-wide baseline actual emissions and potential to emit calculations. However, we note that while Table 4.1.a. in BAPC's Class I Application Technical Review document includes fugitive PM<sub>10</sub> emissions in the estimate of the facility's PM<sub>10</sub> potential to emit, it is not clear that fugitive PM<sub>10</sub> emissions were included in the calculation of the facility's baseline actual emissions. We seek clarification from BAPC on how the fugitive PM<sub>10</sub> portion of the net emission change for PM<sub>10</sub> was calculated, including a the distance between the quarry and the plant, and increases or decreases in emissions from haul roads, storage piles, and other fugitive PM<sub>10</sub> emission sources.

The tables in section 4 of the Technical Review document are useful in understanding the emission changes associated with this project. Since the fact that the facility is netting out of PSD review is the most salient aspect of this permitting action, we think that a description of netting, both in general under the PSD regulations and specifically for this action, would be a useful addition to the document.

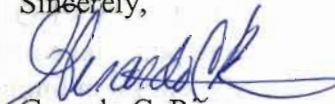
BAPC does not discuss how the proposed emission limits were determined in its Class I Application Technical Review document. However, a new state-of-the-art preheater/precalciner kiln equipped with low NO<sub>x</sub> burners can achieve an emission rate much lower than BAPC is proposing in the draft permit. Although Best Available Control Technology (BACT) is not required and no add-on NO<sub>x</sub> controls will be installed on the new kiln, the permitted emission limit should reflect current technologically feasible emission rates.

We offer the following two examples of cement plant projects in which new kilns that did not trigger PSD and do not have add-on NO<sub>x</sub> controls have been permitted at emission rates well below what BAPC has proposed. The Riverside Cement plant in California is permitted at 2.45 lb/ton of clinker (permit issued 5/30/07). The Titan Florida Pennsuco plant in Florida is permitted at 2.17 lb/ton of clinker (permit issued 10/5/05). In addition, kiln #5 at the TXI Midlothian plant in Texas achieves an emission rate of less than 2.0 lb/ton without add-on controls, according to a report prepared for the Texas Commission on Environmental Quality. If you need assistance obtaining the documentation for the above examples, we would be happy to share them with you.

Finally, we recommend that BAPC add average lb/ton of clinker limits to the lb/hour limits for all the new kiln limits.

Please contact Roger Kohn at (415) 972-3973 or [kohn.roger@epa.gov](mailto:kohn.roger@epa.gov) if you have any questions concerning our comments.

Sincerely,



Gerardo C. Rios  
Chief, Permits Office  
Air Division